

From: Hull, George  
Sent: Monday, May 07, 2018 05:40 PM  
To: Mia, Marcia; Chapman, Apple  
Subject: RE: Question from InfoSight

Mia,

No questions. Please provide to OAQPS. Thanks, George

From: Mia, Marcia  
Sent: Monday, May 07, 2018 10:32 AM  
To: Chapman, Apple <Chapman.Apple@epa.gov>; Hull, George <Hull.George@epa.gov>  
Subject: RE: Question from InfoSight

George,

Do you have any comments on Apple's suggested language? If not, I will provide it to OAQPS.

Marcia B Mia, Acting Chief

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Chapman, Apple  
Sent: Tuesday, May 01, 2018 11:19 AM  
To: Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>  
Subject: RE: Question from InfoSight

My preference would be something more like:

**Ex. 5 Attorney Client (AC)**

Ms. Apple Chapman |Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW, Washington DC, 20004 |202-564-5666 (office)|202-841-6076 (mobile)|

From: Mia, Marcia

Sent: Tuesday, May 01, 2018 11:13 AM

To: Chapman, Apple <Chapman.Apple@epa.gov>; Hull, George <Hull.George@epa.gov>

Subject: RE: Question from InfoSight

It was originally done when the 90 stay was vacated and the 2 year stay was proposed.

Marcia B Mia, Acting Chief

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Chapman, Apple

Sent: Tuesday, May 01, 2018 11:12 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>

Subject: RE: Question from InfoSight

I don't think so. Remind me again why we included the language on enforcement discretion?

Ms. Apple Chapman |Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW, Washington DC, 20004 |202-564-5666 (office)|202-841-6076 (mobile)|

From: Mia, Marcia

Sent: Tuesday, May 01, 2018 10:57 AM

To: Chapman, Apple <Chapman.Apple@epa.gov>; Hull, George <Hull.George@epa.gov>

Subject: FW: Question from InfoSight

Seems we should help with this one. It involves enforcement of NSPS 0000a under the proposed stay.

We previously stated: The rule remains in effect. EPA may elect to exercise its enforcement discretion on a case-by-case basis with respect to the fugitive emissions monitoring requirements. Companies that have specific questions regarding their compliance obligations should contact the appropriate EPA regional office.

Is there anything we wish to say differently?

Thanks.

Marcia B Mia, Acting Chief

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Marsh, Karen

Sent: Friday, April 27, 2018 10:53 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Davis, Alison <Davis.Alison@epa.gov>

Subject: FW: Question from InfoSight

Marcia,

Can you help with a response on this one?

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Dennis Garlington [mailto:dgarlington@infosight.com]

Sent: Friday, April 27, 2018 10:23 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Question from InfoSight

It's a confusing timeline. Your website says regulations were issued in June 2016 and the stay was issued June of 2017. Now you tell me it is a proposed stay so it hasn't actually started yet. You might call it "an indefinite stay" ....

So why am I asking? Two days ago I was at a regional O&G show in Belmont Country, OH ... 160 vendors, maybe 1000 people altogether ... mainly upstream NG people and local suppliers. To my surprise the terms 'LDAR' and 'Quad O(a)' struck a chord with about 6 people. All those who knew the terms were in some way involved with the two ethane cracking plants being developed in the area. I thought that very curious.

So, here's what I understand now. The regs are not being enforced because of a proposed stay. And if the stay is finalized it will be 2 years before they begin enforcement. And if EPA decides to rewrite the regs there's no telling when the regs will be enforced.

Am I right? Pretty much right? Nowhere close? ????

Dennis Garlington

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From: Marsh, Karen [mailto:Marsh.Karen@epa.gov]

Sent: Friday, April 27, 2018 9:25 AM

To: Dennis Garlington

Subject: RE: Question from InfoSight

The 2 years would not start until we issue a final stay.

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Dennis Garlington [mailto:dgarlington@infosight.com]

Sent: Friday, April 27, 2018 9:24 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Question from InfoSight

Thank you Karen. A clarification please: is it 2 years from June 2017? ...or 2 years from June 2016, when the rules were promulgated?

Dennis Garlington

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From: Marsh, Karen [mailto:Marsh.Karen@epa.gov]

Sent: Friday, April 27, 2018 9:13 AM

To: Dennis Garlington

Subject: RE: Question from InfoSight

Hi Dennis,

Thank you for your note. I too am sorry we did not connect during 4C this year. I hope the conference was beneficial for you.

As you are aware, in June 2017, EPA proposed a two year stay of the fugitive emissions, pneumatic pump and professional engineer certification requirements in the rule while the agency reconsiders them. EPA is still examining comments it received on the proposed stays and subsequent Notices of Data Availability. We haven't finalized a stay at this time.

I hope this helps.

Karen

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Dennis Garlington [mailto:dgarlington@infosight.com]

Sent: Thursday, April 26, 2018 12:50 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: Question from InfoSight

Hello Karen - we met at last year's ISA meeting. And I'm sorry to say I didn't run into during this year's 4C conference - my bad luck! I hope all is well with you.

Yesterday I attended the Ohio Valley Regional Oil & Gas expo, held in Belmont County, Ohio. It had a surprising large turnout - perhaps a thousand vendor reps, professional attendees and curious local residents - all focused on oil & gas coming out of the Utica and Marcellus shale plays.

I asked everyone I met what they thought about LDAR and Quad O(a). With very few exceptions, I got nothing but blank stares.

Ignorance is bliss unless it the EPA issues new regulations. I know you (rightfully) won't comment on a date for a new final ruling, but I'm wondering,

- When does the 2-year year stay expire?, and
- Can my blissful neighbors expect just 60 days to comply?

Thanks in advance,

Dennis Garlington

Account Management

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